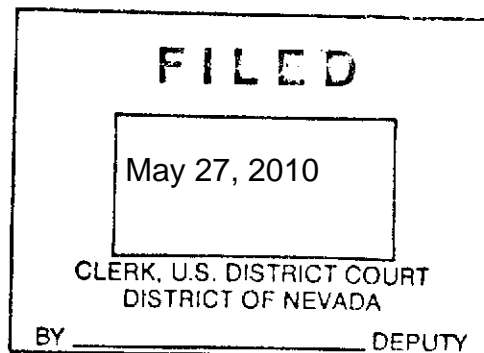


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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 -oOo-

8 UNITED STATES OF AMERICA,)
9 PLAINTIFF,)
10 v.)
11 CHERYL L. STALEY,)
12 DEFENDANT.)
13)
14)

CRIMINAL INFORMATION

Case No. 2:10-cr-00214-RLH-PAL

VIOLATIONS:

29 U.S.C. § 501(c) (Embezzlement from Union); 29 U.S.C. § 439(c) (Falsifying Union Records)

15 **The United States Attorney for the District of Nevada charges that:**

16 **COUNT ONE**

Embezzlement From Union

17 1. From on or about January 1, 2003, to on or about January 12, 2009, in
18 the State and Federal District of Nevada,

19 **CHERYL L. STALEY,**

20 defendant herein, while a person employed directly by Local 501 of the International
21 Union of Operating Engineers (IUOE), a labor organization engaged in an industry
22 affecting commerce, did embezzle, steal and unlawfully and willfully abstract and
23 convert to her own use the moneys and funds of said labor organization, in the
24 approximate amount of \$230,000, in violation of Title 29, United States Code, Section
25 501(c).
26

COUNT TWO

**Falsification of Financial Records Required
To Be Kept by Labor Union**

1. At all times material to this Indictment, the International Union of Operating Engineers (IUOE), Local 501, was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, *et seq.*, required to file an annual financial report with the Secretary of Labor.

2. From on or about January 1, 2003, to on or about January 12, 2009, in the State and Federal District of Nevada,

CHERYL L. STALEY,

defendant herein, did willfully make a false entry in and conceal and withhold and destroy a record required to be kept by Section 436 of Title 29, United States Code, that is, deposit slips and membership dues payment history, record on matters required to be reported in the annual financial report of IUOE, which was required to be filed with the Secretary of Labor for such labor organization's fiscal years 2003 through 2009. All in violation of Title 29, United States Code, Section 439(c).

DANIEL G. BOGDEN
United States Attorney


KATHRYN C. NEWMAN
Assistant United States Attorney

Dated: May 12, 2010.